

#1

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 12:40:24 PM
Last Modified: Tuesday, January 30, 2018 12:41:41 PM
Time Spent: 00:01:17
IP Address: 47.34.206.22

Page 1

Q1 First Name (Optional)

Susan

Q2 Last Name (Optional)

Soares

Q3 Organization (Optional)

CARE

Q4 Title (Optional)

Executive Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

We need an EVENT subcommittee!!!

#2

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, January 30, 2018 2:16:44 PM
Last Modified: Tuesday, January 30, 2018 2:20:45 PM
Time Spent: 00:04:01
IP Address: 73.231.72.150

Page 1

Q1 First Name (Optional)

Amanda

Q2 Last Name (Optional)

Reiman

Q3 Organization (Optional)

International Cannabis Farmer's Association

Q4 Title (Optional)

Board Secretary

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

The goal of the microbusiness was to allow small cultivators to engage in multiple activities without obtaining separate licenses. Akin to small breweries or wineries, these businesses could do everything from seed to sale. However, the regulations require that these activities occur on separate premises. This makes a microbusiness all but impossible for small farmers in the hills of Northern CA who have farms in locations not suitable for commercial access. Therefore, it is recommended that microbusiness activity be allowed to occur on separate premises as long as each premise is zone appropriately. So, like wine, producers could have a farm in one location, process their product in another location and have a retail shop in town.

#3

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Wednesday, January 31, 2018 2:24:17 PM
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IP Address: 99.187.228.47

Page 1

Q1 First Name (Optional)

Valerie

Q2 Last Name (Optional)

Edwards

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Small-Scale Cultivator and Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee**Q6 Feedback for Subcommittee**

I am a 64-year-old cultivator and edibles maker. I used to sell my edibles in the Oakland area and San Francisco area. I work from my home and am also food-handler certified. I can no longer sell my products, produced from my own organically-grown cannabis because I cannot afford the high cost of the permits, licenses, track and trace, and distribution. I used to full-test my edibles for purity and potency produced my own packaging, transported, and sold my own products as a small-scale, cottage-industry business owner. Small business owners have historically made up the back-bone of this county. Please provide a cost effective way of allowing small producers like me to continue to supplement my income using this wonderful plant. If small, heritage growers and manufacturers are pushed out of the system, large producers will be the only ones who can afford to continue. It is the small growers who created this industry. Please protect us and allow us to continue.

#4

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 4:45:56 PM
Last Modified: Thursday, February 01, 2018 5:05:59 PM
Time Spent: 00:20:03
IP Address: 108.208.54.44

Page 1

Q1 First Name (Optional)

Paul

Q2 Last Name (Optional)

Hansbury

Q3 Organization (Optional)

Lovingly & Legally

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Cannabis Advisory Committee: Subcommittee Input Survey

Q6 Feedback for Subcommittee

Can a Microbusiness have aspects of its business on remote locations?

For example, can I have a brick and mortar retail or a warehouse that is at a location other than my home property where all other aspects are performed?

This may be less disruptive to the community.

Since my microbusiness is based out of my home, do I have to conform to all of the security measures spelled out in the Manufacturing regulations?

For example, 24 hour video surveillance in my kitchen seems a bit extreme. There should be relaxed measures for Home based microbusinesses. Perhaps the Local jurisdiction would be able to establish what is appropriate.

As a microbusiness, may I act as a distributor for my neighbor who is a licensed cultivator?

As a microbusiness, may I manufacture products using my neighbor's licensed cultivated cannabis?

Is there a limit as to how many employees I may have?

Are there any assurances that the cost of a microbusiness license will not rise appreciably?

#5

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Thursday, February 01, 2018 5:47:47 PM
Last Modified: Thursday, February 01, 2018 5:51:48 PM
Time Spent: 00:04:00
IP Address: 108.208.54.44

Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee**Q6** Feedback for Subcommittee

I need to have the ability to have a Adult Use garden and a seperate Medical Garden. May a microbusiness use the same manufacturing facility as long as I do not commingle the cannabis. This would be documented through Track and Trace.

#6

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Saturday, February 03, 2018 7:55:00 PM
Last Modified: Saturday, February 03, 2018 8:02:32 PM
Time Spent: 00:07:31
IP Address: 98.238.139.14

Page 1

Q1 First Name (Optional)

Wade

Q2 Last Name (Optional)

Olsen

Q3 Organization (Optional)

Farmers Favorite

Q4 Title (Optional)

Farmer

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

In order to bridge the gap from gardener to farmer we need the opportunity to share space and equipment and have community events to demonstrate safe practices, and be able to farmers market farm to table seed sharing, and hilight the culture that the cannabis industry has to offer.

#7

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 8:41:38 AM
Last Modified: Monday, February 05, 2018 8:44:20 AM
Time Spent: 00:02:41
IP Address: 97.73.240.103

Page 1

Q1 First Name (Optional)

William

Q2 Last Name (Optional)

Gross

Q3 Organization (Optional)

Green Rush Trading Company

Q4 Title (Optional)

CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

PLEASE PROMOTE Micro business in RL zoning.

#8

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Monday, February 05, 2018 3:11:41 PM
Last Modified: Monday, February 05, 2018 3:13:40 PM
Time Spent: 00:01:58
IP Address: 159.83.252.213

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Microbusiness Subcommittee**

Q6 Feedback for Subcommittee

Request to change regulation to authorize a Local Health Department or Health Officer to have their permit and/or inspection activities apply to the cities within a county

#9

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 11:15:45 AM
Last Modified: Tuesday, February 06, 2018 11:21:16 AM
Time Spent: 00:05:31
IP Address: 50.250.197.190

Page 1

Q1 First Name (Optional)

Brian

Q2 Last Name (Optional)

Kahn

Q3 Organization (Optional)

Cannabis Operator

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

The regulations need to be updated to properly address who is able to properly manage all the cannabis waste that will be created. More specifically, the regulations need to ensure that if a cannabis operator is going to utilize a third party cannabis waste management company, the cannabis waste management company must obtain the proper cannabis licenses to transport and render the cannabis waste. Any random person or existing trash company CANNOT handle cannabis waste. This cannabis waste management company MUST have the appropriate cannabis licenses such as a cannabis distribution license and cannabis manufacturing license (processing license). Since the product that will be picked up is untreated cannabis product (un-rendered cannabis product), the movement of the cannabis requires a distribution license. The distribution license will allow the cannabis waste management company to pick up the untreated cannabis since it is still considered cannabis product, and the manufacturing (processing) license will allow the waste management company to render the cannabis product into neutralized cannabis waste. These licenses not only make the cannabis waste management company compliant, but also help with the track and tracing of all stages of the cannabis product through Metrc since all cannabis license holders need to use the track and trace system. The proposed changes will guarantee that all cannabis waste is being handled by cannabis-permitted companies that have extensive working knowledge in the industry. These changes will ensure that all cannabis waste streams are properly identified and documented through the State's Track and Trace System, and ensure all cannabis operators are working compliantly together.

#10

COMPLETE

Collector: Web Link 1 (Web Link)
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IP Address: 98.234.230.36

Page 1

Q1 First Name (Optional)

Jonathan

Q2 Last Name (Optional)

Kramer

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Since this license is a new concept and not well explained, if we have a local permit and state issued retail license, and obtain the microbusiness which allows us to cultivate up to 10,000 sq ft, can we sell the flower we grow to our customers once its been tested and labeled? If not, why?

#11

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, February 06, 2018 2:26:31 PM
Time Spent: 00:00:49
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Page 1

Q1 First Name (Optional)

Megumi

Q2 Last Name (Optional)

Reagan

Q3 Organization (Optional)

Respondent skipped this question

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

To Whom It May Concern:

I'm writing you to express concern over cannabis waste regulations. Cannabis waste comes in innumerable forms. I've found that the layman generally associates cannabis waste with leaves, stalks, stems, and other plant and soil byproducts. However, it's important to note that cannabis waste also includes post-extracted cannabis plants and flowers, failed lab tested materials, ancillary manufactured waste (for example, i.e., wax paper, gloves, beakers, etc.), retail display items, and returned/damaged retail items. These streams of waste come from all industry stakeholders: cultivators, manufacturers, retailers, distributors and testing labs. Handling the volume of waste produced by these stakeholders creates an ancillary industry that must be regulated.

The regulations need to be updated to reflect who is qualified to properly manage cannabis waste. The vast amounts of cannabis waste produced by the industry pose a serious risk to public health, specifically children and the disenfranchised, if not handled by properly licensed cannabis waste haulers as opposed to general waste management service providers. Third party cannabis waste management companies must obtain the proper licenses to transport and render cannabis waste. Frequently, cannabis byproduct and waste are indistinguishable from safe-to-consume materials and/or products. To mitigate these risks, limiting the exposure of the public to cannabis waste vis-a-vis safe and sustainable disposal of cannabis waste that has been tracked and traced and handled by licensed cannabis waste haulers is imperative. It will ensure that all ecosystems—the environment, the public and industry stakeholders can successfully co-exist.

Thank you.

#12

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, February 06, 2018 4:56:33 PM
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IP Address: 75.146.84.174

Page 1

Q1 First Name (Optional)

Steven

Q2 Last Name (Optional)

Domingo

Q3 Organization (Optional)

WeDrop

Q4 Title (Optional)

President & CEO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

- Multi-use facilities are a must at a local level. If the license exists, then having everything at the same facility just makes sense.
 - Given then inability for cannabis businesses to write off business expenses, the state should consider tax credits or other incentives for companies that can produce quality jobs.
 - On-sight consumption is an imminent factor of commercial cannabis and should be addressed to accommodate the existing demand and help eliminate the black market. It could present the possibility of a “farm to fork” or for the industry, such as a “craft cannabis” educational model for patients and consumers alike to help break the current taboo and promote safe and healthy consumption methods.
-

#13

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, February 06, 2018 6:11:54 PM
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IP Address: 67.174.233.8

Page 1

Q1 First Name (Optional)

Jude

Q2 Last Name (Optional)

Thilman

Q3 Organization (Optional)

Dragonfly Wellness Center

Q4 Title (Optional)

Owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

The microbusiness is a lifeline to small cannabis businesses. This license needs to be allowed wherever cultivation, manufacturing or retail are allowed. For a rural area, combining activities in one location is essential for our traditional craft cannabis businesses to scale up and compete in the new statewide marketplace. Without the microbusiness license, many of our long-time, family-owned businesses will go under.

#14

COMPLETE

Collector: Web Link 1 (Web Link)
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Page 1

Q1 First Name (Optional)

Respondent skipped this question

Q2 Last Name (Optional)

Respondent skipped this question

Q3 Organization (Optional)

Mendocino Generations

Q4 Title (Optional)

Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee**Q6** Feedback for Subcommittee

February 6th, 2018

Dear Subcommittee Members,

We write to you today, as a group of small farms located throughout Mendocino County, to express our concerns with the current cannabis emergency regulations and are providing input on changes we would like to see made in the new regulations. We are grateful for the opportunity as stakeholders and interested parties to engage in this process. We hope that our suggestions will be considered when drafting the new regulations so that the cannabis-licensing program can operate with efficiency and success.

The largest license type allowed in Mendocino County is 10,000 sq ft of plant canopy. This equates to less than a quarter acre and considered a "hobby garden" by agricultural standards.

State regulations must take the vast disparity in permitted size cultivations throughout the state into consideration as permanent regulations are formulated. Committees must understand the historical significance and economic dependence of counties in the north coast region on cannabis cultivation. Small cannabis farmers need state protection to continue into the regulated and legal era to allow for a viable transition and avoid epidemic bankruptcies, defaults, plummeting property tax revenues and destruction of a unique cultural fabric that can be the regions opportunity rather than its demise.

Various compliance issues imposed specifically on the cannabis industry, and no other agricultural industry in California, by CDFA,

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CWQCB, Cal Fire, CDFW, and a slew of local jurisdictions are simply not viable for small farmers if scale, rural access, cooperative efficiencies and considerations for sustainable methods are not protected by the BCC.

Even though some small farmers may diversify into processing and or low impact manufacturing as regulations allow, our primary concern at this writing is for the small farmer, terrified that their homes, livelihood and decades of investments in the development of methods and genetics will arbitrarily be taken from them by the BCC if the ACA does not act now on their behalf.

Small cannabis cultivators must be afforded the same considerations and protections as other small agricultural endeavors like small vineyards, artisan breweries and related boutique style retailing of their products. As stated in SB94 and its incorporation into Business and Professional Code 26013(c), upon which all cultivators in the state relied under MAUCRSA, "mandate only commercially feasible procedures, technology or other requirements, and shall not unreasonably restrain or inhibit the development of alternative procedures or technology to achieve the same substantive requirements, nor shall such regulations make compliance so onerous that the operation under a cannabis license is not worthy of being carried out in practice by a reasonably prudent business person".

REGARDING MICRO-BUSINESS:

With the passage of Prop 64, small cannabis farmers were encouraged by the opportunity to participate as micro-businesses. We believed the intent of the micro-business license type was aimed at providing parity of vertical integration for the small farmer and hence, survival in the emerging regulated marketplace.

Currently, the Mendocino County Board of Supervisors has not yet approved a micro-business license type. Mendocino Generations associates have lobbied the Board, but we believe they are reluctant to act because the state micro-business license is still subject to possible revisions.

Please consider our suggestions below:

1. Critical to small farmers is that micro-business licenses be available wherever cultivation of less than 10,000 sq ft is allowed
2. Revise Section 5308, 5309, 5043, and 5047, so that small farmer micro-business licensees be allowed to use a Distributor-Transport Only license as the "distributor" component, for one of the four micro-business license requirements
3. A small farmer micro-business licensee be allowed to transport a representative sample of their farm's products to and from a lab for testing Allowing micro-business transport to and from a lab will minimize the environmental impact and confusion of testing lab personnel traveling to remote farms, on dirt roads, through multiple locked gates and at considerable expense.
4. Allowing micro-business cultivators to transport to and from a testing lab will facilitate the efficiency of organizing for and participating in direct sales opportunities requested by small farmers
5. Allow micro-business cultivators to establish retail premises in locations separate from farms and appropriately zoned for publicly accessed commercial activity
6. Allow micro-business cultivation as both "M" and "A" until products have been tested
7. Modify 5412(b) to allow micro-businesses to package and label their own products if they are compliant with the specific safety mandates of the individual license
8. Eliminate the requirements of Building and Professional Code Sections 5045 require security personnel from small farms This type of security requirement is impractical in rural areas where access to power and the Internet are intermittent if available. There will be limited resources in Mendocino County to staff security personnel in rural areas of the county.
9. Delete the requirement of Section 5044 for security cameras for micro-businesses licensed on rural, small farms. This requirement is often impossible in rural areas, not to mention onerously expensive
10. Reduce fees, bond requirements and insurance requirements for small farm micro-businesses. Reduce bond and insurance

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requirements to better reflect the quarter-acre farm allowed under the micro-business license.

11. Allow non-store front retail as the "retail" component, for one of the four micro-business license requirements

Thank you for your consideration and support,

Audrey's Farm
Big Dirty Farms
Briza Botanicals
Brother Bee Farms
Coastal Ridge Botanicals
Emerald Naga Farms
Empire Gardens
Flatbed Ridge Farms
Fire Flower Farm
Full Sun Farms
Giving Tree Farms
Granny Jacks
Gypsy Wagon Farms
Herbanology Farms
Higher On The Hog Farms
Hummingbird Farms
Laughing Farms
Le Foret
Magnolia & Fig Cultivars
Mendocino Grasslands
Mendocino Organic Medicine
Moongazer Farms
Oak Knoll Farms
One Feather Ranch
Potter Valley Farms
Reach High Farm
River Txai Farms
Sensi Farms
Sun N Moon Ranch
Sunbright Gardens
Sweet Sisters Family Farm
UV Organics

#15

COMPLETE

Collector: Web Link 1 (Web Link)
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Page 1

Q1 First Name (Optional)

Hannah

Q2 Last Name (Optional)

Nelson

Q3 Organization (Optional)

Hannah L. Nelson Attorney At Law

Q4 Title (Optional)

Mendocino County Working Group Member/Attorney/Cannabis Policy Advisor

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

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DISTRIBUTION SUBCOMMITTEE COMMENTS

I am an attorney who has specialized in cannabis and cannabis related policy for more than 25 years. In 1999, after the California Supreme Court upheld the case I litigated pro bono for nearly three years requiring the first-ever court-ordered return of seized medical cannabis, the then District Attorney, then Sheriff, and I proposed a permitting scheme to the then Board of Supervisors. We were ahead of our time and the matter was not pursued. However, in 2009, I was recruited by Sheriff Tom Allman to help craft the original permitting program in Mendocino County. I have been intimately involved in helping draft cannabis policies and permitting programs ever since. I currently serve on five Mendocino County Working Groups and maintain a practice that assists applicants through the regulatory process at the local and state levels across all agencies. I am excited to see the emerging regulated industry. Given my interaction with local and state agencies as well as applicants, I have discovered numerous issues that are ripe for discussion as the CAC advises the regulatory agencies on non-emergency regulation drafting.

PLEASE NOTE: that while my comments resemble those that were submitted as part of the Mendocino County Board of Supervisors Submission on behalf of the Working Group, there are differences in my explanations and I have added one item at the end.

Thank you for your consideration.

MICROBUSINESS

A. Allow Distributor Transport-Only License to Qualify for Microbusiness Activity for “licensee to licensee” transport of cannabis goods. Local land use regulations often limit rural applicants from conducting retail or full scale distribution on property that may be cultivated on. As a result, small farmers who wish to take advantage of the Microbusiness license must be allowed to utilize the Distributor-Transporter Only license as one of the three required activities in order to effectively participate.

B. Please Modify Same Licensed Premises Requirement in Section 5500 Microbusiness (d): Specifies that all cultivation, manufacturing, distribution, and retail activities performed by a licensee under a Type 12-microbusiness license shall occur on the same licensed premises. This requirement severely disadvantages rural cultivation communities which have significant zoning and land use obstacles to co-locating cultivation production with manufacturing, distribution and retail on a single premise. These rural cultivation communities are relying on vertical integration and direct consumer sales to support a viable local cannabis industry. We recommend allowing microbusinesses to conduct licensed activities on separate premises. ☐

C. CONFLICT BETWEEN § 5025-Premises AND § 5500-Microbusiness. Section 5025 states the Bureau may allow a licensee to have the same licensed premises for two separate commercial cannabis licenses if all of the following criteria are met:

- a. The licensee holds both an A-license and an M-license for the identical type of commercial cannabis activity; ☐
- b. The licensee who holds both licenses is identical in name, business formation, and ownership; ☐
- c. The licensee only conducts one type of commercial cannabis activity on the premises; ☐

However, Microbusiness regulation insists on multiple activities on same premises. While I also request that the Microbusiness license allows for multiple locations for the different activities, it would seem that as-is, the two sections are in conflict and must be reconciled.

Please remove the restriction on multiple cannabis activities on same premises for Microbusinesses. ☐

D. Community Microbusiness: Allow a Microbusiness licensee the ability to partner with Cottage cultivating licensees to manufacture and/or distribute for them. Not to exceed 10 identified Cottage licensees.

E. Modify 5412(b): Permit retail and microbusinesses to package and/or label cannabis goods, providing they hold a Distribution and/or Processing License.

F. Nursery License With Flowering Cultivation/Microbusiness Please clarify and affirm that ownership of a Nursery license on the same property (but not considered the same licensed premises) in addition to a flowering Cultivation license for up to 10,000 square feet under a Micro-business license applied for by the same person/entity (but as a separate license from the Nursery license) would NOT disqualify the applicant from the Micro-business license because they would ultimately hold more than 10,000 square feet (on the same property, but not as the same licensed premises). Specifically, in Mendocino County, applicants are allowed to have a Nursery license of up to 22,000 square feet. However, if that Nursery license is on the same parcel as a flowering cultivation permit of up to 10,000 square feet, the Nursery square footage is limited to 12,000 square feet. The theory is that the parcel is allowed to have up to the total legal limit, which if it were solely a Nursery, would be 22,000 square feet, so one can cultivate up to 10k for flowers and up to 12k for the Nursery. As small farmers, a lot of folks have decided that they must pursue all avenues of diversification possible in order to have a fighting chance to compete with bigger operators around the state. For some, that means having a nursery and a flowering cultivation. If they are permitted to have one state license for their Nursery and another Micro-business license for their Cultivation (flowering), their Manufacturing (only nonvolatile will be allowed here unless they are on industrially zoned property) and Distributor-Transporter-Only activities, they will be able to maintain a diversification that might help keep them competitive. I believe that if the Nursery is kept as a separate licensed premises, there is no bar to also applying for a Micro-business with the 10k of cultivation, the manufacturing and the Distributor-Transporter license. However, I request that this interpretation be affirmed.

#16

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 8:41:32 PM
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Page 1

Q1 First Name (Optional) **Respondent skipped this question**

Q2 Last Name (Optional) **Respondent skipped this question**

Q3 Organization (Optional) **Respondent skipped this question**

Q4 Title (Optional) **Respondent skipped this question**

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Microbusiness Subcommittee**

Q6 Feedback for Subcommittee

State Regulation Amendment Requests:

- 1.Determine canopy of plants based on each plant and do not include pathways in canopy determination
- 2.Lower the cultivation tax and base it on a percentage rather than fixed dollar amounts
- 3.Order more track and trace tags since there seems to be only a limited number
- 4.Remove the 4-acre cap on Co-Ops
- 5.Reinstate the acreage cap on licenses
- 6.Remove the requirement that all activities of a micro business license occur on the same premises. Many cultivators in rural counties will not be able to comply due to zoning restrictions. Consider opening up packaging, processing and/or manufacturing to other zoning districts as there are any extremely limited amount currently available. Perhaps allow outside dense residential areas?
- 7.Remove Track and Trace requirements of weighing wet weight at harvest. This requirement does not make sense since the cannabis will change greatly in weight once it is fully dried. Weather (hot and dry vs rainy) will also greatly affect wet weight so there will be no benefit to a wet weight as it's completely arbitrary. Each plant and strain will vary in terms of how much moisture is lost in the curing

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process. Therefore for cultivators selling dry product, require a dry weight amount to be entered and not wet weight of the entire plant.

8. Remove the 25 and 50 plant count for specialty cottage outdoor and specialty outdoor license types and instead use 2500 sq ft and 5,000sq ft. The corresponding permits under mixed light allow for sq ft canopy size, outdoors should match.

9. Monitor the testing prices being set by each lab. These costs are WAY too high for any small specialty cottage cultivator to be able to afford. Especially if cultivating 25 plants, at \$600-\$1000 per batch test, cultivators will struggle greatly to afford these prices for testing.

The regulatory expansion related to testing is going to either push prices higher which will make it not accessible for lower income patients and consumers or force small farmers to cultivate the same strain in a batch to try and save the margin.

For small batch cultivators, if you produce 3 units in a batch these testing costs of \$600-1000 per batch (or \$200-333 per unit) plus the flat cultivation tax rate of \$148 per unit is now nearly reducing the margin for the cultivator to a net negative.

10. Set eco-friendly standards for packaging to lessen the industry's impact on consumer waste in California.

11. Please remove the Camera regulations for small cultivators especially in rural counties such as Mendocino County. Small farms off grid with limited access to internet if any will have a serious hardship in complying with this standard. Perhaps a game camera could qualify for this regulation. This should also be considered for micro-business farms that are located in rural areas.

12. Allow people/companies with multiple permits to process all cannabis at one location. This will reduce having to setup and maintain multiple processing locations and equipment and lessen environmental impacts.

13. Remove the 25 plant count for specialty cottage license and instead use 2500 sq feet or at the very least allow the option of either 25 plants OR 2500 sq ft

14. Allow cultivators to process their own cannabis onsite under home-occupation as long as it meets the requirements of local county and city building codes etc.

16. For micro-business, allow direct sales at farmer's markets or events or other non-store front retail to count as a retail use, and allow distributor-transport only to count as distributor use... this will allow more cultivators to apply for a micro-business if they live in rural areas where zoning will not allow for retail locations or full distribution.

17. Support direct local sales through expanded venue allowances for cannabis events

18. Allow the cultivation license to be transferable in the event of a land sale. Allow an optional "inactive" status for cultivation licenses that would keep the license valid even if not in use. The investment required to comply and obtain a cultivation license is a direct investment to property making it part of the asset. The ability for a small farmer to succeed in this new market place is unknown at best and if they should choose to not participate their investment needs to be protected.

19. Allow the storage of cannabis to include cargo containers with a length of 40 feet.

#17

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 9:01:08 PM
Last Modified: Tuesday, February 06, 2018 9:01:25 PM
Time Spent: 00:00:16
IP Address: 162.201.66.29

Page 1

Q1 First Name (Optional) Respondent skipped this question

Q2 Last Name (Optional) Respondent skipped this question

Q3 Organization (Optional) Respondent skipped this question

Q4 Title (Optional) Respondent skipped this question

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments. **Microbusiness Subcommittee**

Q6 Feedback for Subcommittee

Micro-business Sub Committee

- 1.Remove the requirement that all activities of a micro business license occur on the same premises. Many cultivators in rural counties will not be able to comply due to zoning restrictions. Consider opening up packaging, processing and/or manufacturing to other zoning districts as there are any extremely limited amount currently available. Perhaps allow outside dense residential areas?
2. Remove the camera requirement for distribution for micro-businesses and distributor transport only licenses. Many farms in rural parts of Mendocino County and beyond will not be able to comply with this regulation due to lack of internet availability. Especially for farms that are off grid
3. For micro-business, allow direct sales at farmer's markets or events or other non-store front retail to count as a retail use, and allow distributor-transport only to count as distributor use... this will allow more cultivators to apply for a micro-business license if they live in rural areas where zoning will not allow for retail locations or full distribution facilities.

#18

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 8:59:12 PM
Last Modified: Tuesday, February 06, 2018 9:03:11 PM
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IP Address: 64.194.161.33

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Q1 First Name (Optional)

Holly

Q2 Last Name (Optional)

Carter

Q3 Organization (Optional)

Redwood Roots

Q4 Title (Optional)

CCO

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

We ask for regulations that ensure there isn't a mis-scaled situation with the ¾ license types that allows for larger businesses to access microbusinesses without any limits on production on other aspects of the supply chain.

Lean into the intention of the licenses which we feel is to protect small farmers/producers/businesses, or to allow for scalability at all levels of business.

We request that retail component is fulfilled by events (off site sales).

#19

COMPLETE

Collector: Web Link 1 (Web Link)
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Last Modified: Tuesday, February 06, 2018 9:03:36 PM
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IP Address: 23.113.88.220

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Q1 First Name (Optional)

Karen

Q2 Last Name (Optional)

Byars

Q3 Organization (Optional)

Mendocino Cannabis Resource

Q4 Title (Optional)

owner

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

That a micro business license can include more than one physical locations. In Mendocino County most land zoned for cannabis cultivation are not zoned for other uses.

#20

COMPLETE

Collector: Web Link 1 (Web Link)
Started: Tuesday, February 06, 2018 10:04:49 PM
Last Modified: Tuesday, February 06, 2018 10:06:22 PM
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IP Address: 198.59.53.14

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Q1 First Name (Optional)

Dustin

Q2 Last Name (Optional)

Moore

Q3 Organization (Optional)

International Cannabis Farmers Association

Q4 Title (Optional)

Executive Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Microbusinesses

Comment: It is our strong belief that the purpose of the microbusiness license is to support the development of small business in the cannabis industry. As written, section 5500 Microbusiness (d) requires that all cultivation, manufacturing, distribution and retail activities performed by a licensee under a Type 12U Microbusiness license occur on the same licensed premises. By requiring that these activities occur on the same premises the state will ultimately create exclusionary zoning, eliminating the ability for majority of the State's rural seasonal farmers to obtain a microbusiness license. It is of the utmost importance that the requirement for all activities to occur on the same licensed premises be stricken and that the State allow microbusiness license holders to conduct their activities at multiple suitable locations. This request will be necessary if rural cultivator are going to be eligible for the microbusiness license. In order to further support the traditional seasonal farmer, we respectfully request that the BCC consider allowing microbusiness licensees to use compliant event sales to fulfill their retail activity requirement. For example, a licensee should be able to qualify for a microbusiness license if he or she cultivates 10,000 square feet or less, conducts distribution (or nonvolatile solvent manufacturing) and conducts retail sales at compliant events.

In addition to the above suggestions for the microbusiness license, we have numerous questions regarding the functionality of this license type. These questions include:

- i. Can a licensee hold more than one microbusiness license?
- ii. If so, can these licenses be held on the same premises?
- iii. Can a microbusiness licensee that declares cultivation as one of his or her three qualifying activities hold additional cultivation licenses?
- iv. If so, can the additional cultivation licenses be on the same premises as the microbusiness cultivation?

Direct to Consumer Sales for Farmers at Compliant Events

Comment: Many small farmers are challenged by the cost of regulatory expense facing them and are often operating in rural communities that do not have access to a thriving retail markets and may be located hours from licensed distribution facilities. ICFA is committed to working with regulatory agencies to achieve the ability for Cottage, Specialty and Small type licensed farmers to engage in distribution transportation activities as part of their cultivation license. ICFA also recognizes the importance of direct to consumer access for farmers, such as has been made available pre-2018 through events like the Emerald Cup, Emerald Exchange, and the Healing Harvest Farms' Farmer's Markets. With that said, ICFA is committed to working with regulatory agencies to expand the event licensing sales provisions to allow Cottage, Specialty and Small farmers the ability to conduct retail sales at compliant cannabis events without needing a 'retail' license type. ICFA proposes that the ability to participate in event sales be allowed as part of the cultivation license so long as the licensee uses a licensed distributor to transport the product to the event, and uses a State compliant, Point of Sale system to track all sales conducted at the event.

#21

COMPLETE

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Q1 First Name (Optional)

Genine

Q2 Last Name (Optional)

Coleman

Q3 Organization (Optional)

Mendocino Appellations Project

Q4 Title (Optional)

Executive Director

Q5 Please choose the one subcommittee to which you would like your feedback to be sent. Note: You may submit feedback to as many subcommittees as you wish. Simply click on the link again to submit additional comments.

Microbusiness Subcommittee

Q6 Feedback for Subcommittee

Modify Section 5500 Microbusiness (d): Specifies that all cultivation, manufacturing, distribution, and retail activities performed by a licensee under a Type 12-microbusiness license shall occur on the same licensed premises. This requirement severely disadvantages rural cultivation communities which have significant zoning and land use obstacles to co-locating cultivation production with manufacturing, distribution and retail on a single premise. These rural cultivation communities are relying on vertical integration and direct consumer sales to support a viable local cannabis industry. Recommend allowing rural microbusinesses to conduct licensed activities on separate premises.
